

Exhibit 2

DECLARATION OF PETER PRUSINOWSKI

I, Peter Prusinowski, hereby declare,

1. I am above the age of eighteen and competent to make this declaration. This declaration is based on my personal knowledge and, if called to testify, I would competently testify thereto.

2. I am the founder, owner and Chief Executive Officer of Defendant Empire Holdings Group LLC (“Empire Holdings”), which does business as Ecommerce Empire Builders and Storefunnels.net. I founded Empire Holdings in 2018.

3. Before I founded Empire Holdings, I owned and operated a successful online fishing tackle and supply business. As a hobby, I began posting to a Facebook group about the strategies I found successful in growing an online ecommerce business, driving consumer engagement, and increasing engagement. As more people engaged with my Facebook posts, I began posting educational YouTube videos about my business successes and how other entrepreneurs could use the same strategies in their businesses. Eventually, an aspiring entrepreneur asked me to consult and help them grow their business. What started out as a hobby and genuine interest in teaching others about ecommerce and marketing strategies turned into an ecommerce education, consulting, and software business called Ecommerce Empire Builders.

4. As my new business grew, I brought on Aliakbar Gulshan Hussain and Jordan Strauss to help develop my consulting business. Each had their own special areas of expertise and were successful entrepreneurs working in ecommerce and copyrighting businesses. Together we developed the training program called Ecommerce Platinum,

which is designed to teach aspiring business owners how to build, launch and scale their own independent ecommerce businesses in a variety of verticals or niches. Ecommerce Empire Builders' clients make their own decisions about their businesses product niche, the products their business will sell, product fulfillment, and customer acquisition.

5. Storefunnels.net is Ecommerce Empire Builders' software solution for clients to host their own online stores, similar to the software provided by Shopify. There are currently approximately two hundred fifty (250) companies that are hosting their respective online stores using Storefunnels.net with high customer satisfaction. While some of these companies are also clients of Ecommerce Empire Builders' e-commerce education, consulting, and software services, some of them are not.

6. The claim that I have launched three online businesses in one week, which on their first day were already selling products and making money through Chinese dropshipping operations is true.

7. Certain of Ecommerce Empire Builders' clients have made \$450 per day average, or \$13,500 in average monthly income.

8. Certain of Ecommerce Empire Builders' clients have made "\$93.17k" selling just one product as a part of a sales funnel system where the advertisements highlight one specific product and the benefits and features of that one product.

9. In the past, Ecommerce Empire Builders did, in fact, "award clients 'Empire Builder trophies for hitting over \$10,000, \$50,000, and 7 Figures in their eCommerce businesses."

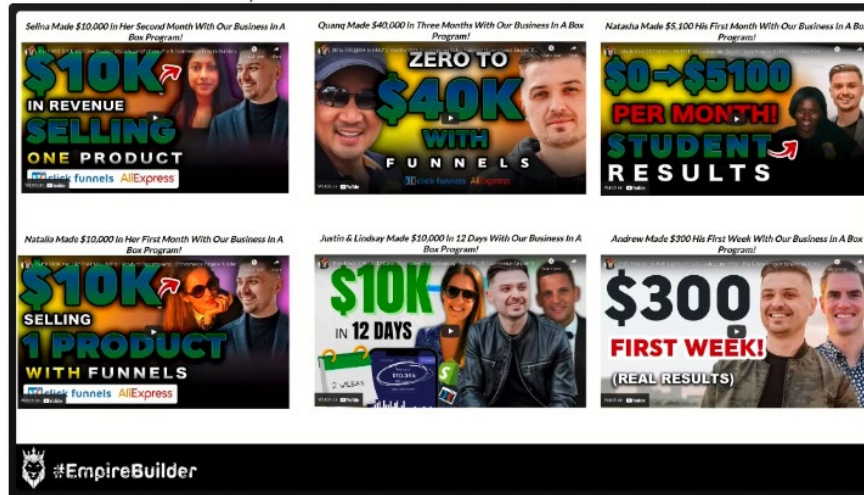
10. The following testimonials, depicted in the FTC's TRO Motion, are true:

- “Selina Made \$10,000 In Her Second Month With Our Ecommerce Platinum Program!” and Selina made “Her FIRST \$10k With One Product Dropshipping!”
- “Natalia Made \$10,000 In Her First Month With Our Ecommerce Platinum Program!” and Natalia made “10k Selling 1 Product”
- “Quang Made \$40,000 In Three Months With Our Ecommerce Platinum Program!” and Quang went from “\$0 to \$40,000+ In ONLY 3 Months With Dropshipping Sales Funnels!”
- “Justin & Lindsay Made \$12,000 In 12 Days With Their DFY Ecommerce Business”
- “Russ Makes \$10,000 Per Month With His DFY Ecommerce Business!”
- “Natasha Makes \$5,100 Per Month With Her DFY Ecommerce Business!”
- “Maria Makes \$500+ Per Week With Our Ecommerce Platinum Program!”

11. Similar to the above, the below claims are true:

Discover How We'll Build, Launch, & Bring In Sales To Your AI-Powered Ecommerce Business In The Next 30 Days!

Click Play and Turn ON the Volume to Watch This Short 20 Minute Video!



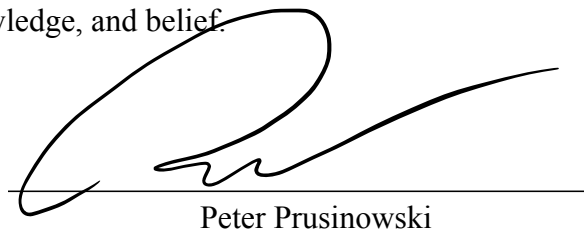
12. The claim that Ecommerce Empire Builders teaches its clients to attempt to achieve a minimum of a “30/40 percent profit” and upwards of “50 to 80 percent profit” is true, especially with respect to digital products given the low cost of goods.

13. The claim that it is possible for an Ecommerce Empire Builders’ client to make around \$60,000 a year is true.

14. If the FTC shut down Ecommerce Empire Builders’ software solution, Storefunnels.net, it would cause irreparable harm to the 250 online businesses that use our software to lawfully sell goods and services to consumers. Shutting down our software solution would cause our client’s websites and storefronts to cease to exist on the Internet, and it would prevent them from accepting orders from customers. This would irreparably harm our clients’ brand reputation and lead to additional ancillary damages from money wasted on advertising campaigns, affiliate commissions, and similar expenses that could not be recovered.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my information, knowledge, and belief.

Executed this 20th day of September, 2024.



Peter Prusinowski